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10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

11 JON POKORSKI,
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13 Plaintiff,

14 vs.

15 ALLY FINANCIAL, INC.;
EXPERIAN INFORMATION
16 SOLUTIONS, INC.; TRANS UNION,
LLC; EQUIFAX INFORMATION
SERVICES, LLC,

17 Defendants.
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Case No.: 2:25-cv-00472-JCM-EJY

**STIPULATION TO EXTEND TIME
TO FILE REPLIES TO
DEFENDANT ALLY FINANCIAL,
INC.'S MOTION TO COMPEL
ARIBTRATION [ECF NO. 20]**

(First Request)

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1 Currently pending before the court is Defendant Ally Financial Inc.’s
2 (“Defendant”), Motion to Compel Arbitration (the “Motion”). ECF No. 20. The
3 Motion was filed on June 11, 2025, the operative deadline for a response by Plaintiff
4 Jon Pokorski (“Plaintiff”) is June 25, 2025, while Defendant’s reply is due by July 2,
5 2025.

6 The Parties have met and conferred in good faith and hereby jointly stipulate and
7 respectfully request a brief extension of the briefing schedule and hearing date related
8 to Defendant’s pending Motion.

9 Counsel for Plaintiff has experienced an unexpected death in his immediate
10 family, necessitating out-of-state travel and time away from work to manage urgent
11 family obligations. In light of these unforeseen circumstances, and to ensure adequate
12 time to prepare the necessary briefing, the Parties stipulate to the following revised
13 schedule:

- 14 • Plaintiff’s deadline to file an opposition to Defendant’s Motion shall be
15 extended by 21 days;
- 16 • Defendant’s deadline to file a reply in support of its Motion shall be
17 extended by 14 days thereafter; and

18 This is the Parties’ first stipulation to extend these deadlines. The requested
19 extension is made in good faith, not for purposes of delay, and will not prejudice either
20 party. The requested relief is narrowly tailored to accommodate unavoidable personal
21 circumstances while preserving the Court’s schedule and judicial efficiency.

22 Accordingly, the Parties respectfully request that the Court approve this
23 stipulation and enter an order adopting the revised schedule outlined above.

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IT IS THEREFORE STIPULATED between the Parties as follows:

- (1) Plaintiff's response to the Motion will be due on or before **July 16, 2027**;
- (2) Defendant's reply in support of its Motion, will be due on or before **July 30, 2025**.

Dated: June 18, 2025

KAZEROUNI LAW GROUP, APC

By: /s/ Gustavo Ponce
Gustavo Ponce
Mona Amini
Attorneys for Plaintiff

Dated: June 18, 2025

TROUTMAN PEPPER LOCKE LLP

By: /s/ Holly Cheong
Holly Cheong, Esq.
Attorneys for Defendant

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: June 18, 2025

